

**FISH AND WILDLIFE SERVICE
FINANCIAL ASSISTANCE**

Financial Assistance

Part 309 Financial Assistance and Grants

Chapter 1 Micro-Grant and Fixed Amount Financial Assistance Awards

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1.1 What is the purpose of this chapter? This chapter establishes policy and procedures for administration of financial assistance awards of less than \$100,000 made to institutions of higher education, hospitals, and other non-profit organizations.

1.2 What is the scope of this chapter? This chapter only applies to financial assistance awards that are:

- A.** Micro-grants (grants that do not exceed \$10,000), and
- B.** Fixed amount awards not exceeding \$100,000.

1.3 What are the authorities for this chapter?

- A.** Federal Financial Assistance Management Improvement Act, (Pub. L. 106-107).
- B.** Federal Grant and Cooperative Agreement Act of 1977 (31 U.S.C. 6301 et seq.).
- C.** Office of Management and Budget (OMB) Circular A-110, Grants and Other Agreements with Institutions of Higher Education, Hospitals, and Other Non-profit Organizations.
- D.** Administrative and Audit Requirements and Cost Principles for Assistance Programs (43 CFR Part 12).

1.4 Who is responsible for implementing the policy and procedures in this chapter?

A. The **Assistant and Regional Directors and the California/Nevada Operations Office (CNO) Manager** ensure that staff follow the policies and procedures in this chapter when making financial assistance awards of less than \$100,000 to non-profit organizations.

B. The **Chief, Division of Contracting and Facilities Management (CFM)**:

- (1)** Develops policies and procedures for administering financial assistance awards, and
- (2)** Develops training on the administrative procedures in this chapter.

C. Regional/CNO Chief Financial Officers:

- (1)** Oversee the administration of financial assistance awards.
- (2)** Ensure staff members:
 - (a)** Take training on how to administer awards of less than \$100,000,
 - (b)** Comply with the policy in this chapter, and
 - (c)** Report required award data in the Federal Assistance Award Data Tracking System (FAADS).

D. Program Representatives:

- (1)** May be Contract Officers or other staff members who administer financial assistance.

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(2) Ensure that staff members clearly define projects and properly evaluate them for technical merit and an acceptable budget.

(3) Monitor the recipient's performance, including, but not limited to, timely receipt of performance reports.

(4) Review and approve or disapprove a recipient's request for payment (on SF-270) within 30 days of receiving the request.

1.5 What is the overall process for grants administration? We use standard Federal grant procedures to administer grants.

A. As required by the Paperwork Reduction Act, we must get approval from the Office of Management and Budget (OMB) to collect information from grantees. Many programs have already obtained OMB approval so they can request additional information in their request for application packages. Contact the Service Information Collection Clearance Officer in the Division of Policy and Directives Management for guidance on obtaining OMB approval.

B. We announce funding opportunities by posting a notice about them on the Catalog of Domestic Assistance (CFDA) Web site and Grants.gov.

C. An applicant proposes a project and a budget.

D. We review the project and budget to determine if they are feasible and reasonable.

E. We make appropriate awards based on funding and requests received.

F. We monitor projects, review necessary administrative paperwork and requests for payment, evaluate projects, and make awards.

1.6 What is a micro-grant and what is a fixed amount award?

A. Micro-grant. A micro-grant is a grant or a cooperative agreement where we contribute \$10,000 or less. We issue micro-grants when we will not be substantially involved in a project, and we sign cooperative agreements when we will be substantially involved in a project.

B. Fixed amount award. We consider fixed amount awards grants or cooperative agreements that are for an established amount that is \$100,000 or less.

1.7 Are all grant recipients required to follow the same cost principles and submit the same reports?
No. Reporting requirements depend on the size and type of award.

A. OMB Circular A-110 allows us to apply less restrictive administrative requirements to grants of \$100,000 or less that we award to non-profit organizations.

B. Table 1-1 below shows how we can streamline the administrative process by excluding requirements for micro-grants and fixed amount awards:

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Micro-Grants \$10,000 or less	Fixed Amount Awards \$100,000 or less
Exclusions below apply to both types of grants:	
12.921, Standards for Financial Management Systems	
12.925, Revision of Budget and Program Plans (paragraphs (c) (1) through (3) and (8), (d), and (e) still apply).	
12.927, Allowable Costs	
12.928, Period of Availability of Funds	
12.935, Supplies and Other Expendable Property	
12.952, Financial Reporting	
12.971, Closeout Procedures	
Requesting Payment	
Service makes payment when a Program Representative determines project is complete. (SF-270 not required.)	Recipient makes payment requests using a SF-270, Request for Reimbursement.
No financial status reports required.	No financial status reports required.

Table 1-1: Requirements from which we can exclude micro-grants and fixed amount awards

1.8 Should all grants and cooperative agreements made to non-profit organizations that are less than \$100,000 allow a more streamlined administrative process? Although many projects are good candidates for taking advantage of the less restrictive administrative requirements, we may determine that we can administer some projects more successfully using standard financial and program reporting requirements.

A. Awards are most suitable for following the streamlined process if they have:

- (1) Well-defined and achievable objectives.
- (2) A reasonable and adequate budget.
- (3) A recipient willing to enter into an agreement with less restrictive financial and reporting practices.

B. Awards may not be suitable for following a streamlined process if they have:

- (1) Highly complex objectives with unpredictable performance outcomes.
- (2) Potential for many changes in methodology or budget.

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(3) A specific statutory or regulatory requirement for financial management and reporting, such as grants for acquiring land.

1.9 What process does the Program Representative follow to make an award?

A. The Program Representative submits a completed assistance package to the servicing Grants Officer before awarding a fixed amount award. The package includes:

(1) The Financial Assistance Agreement Form (FWS Form 3-2335).

(2) The recipient's application, which must include (the Program Representative may waive these requirements for a micro-grant):

(a) The SF-424 document,

(b) Proposal, and

(c) Budget.

(3) The Program Representative's brief, written determination that the application and budget are reasonable and achievable for the proposed amount. The Program Representative determines a budget is reasonable by:

(a) Making sure any unusual expenses are explained in writing.

(b) Using professional judgment and experience to determine if the costs are in line with industry standards.

B. The servicing Grants Officer reviews, processes, and approves or declines to approve the application package. CFM/CGS also must accurately report the necessary award data in the Federal Assistance Award Data System (FAADS).

C. The applicant must agree to and sign the "Micro-Grant or Fixed Amount Assistance Award Provisions" document (see Exhibit 1). We must not obligate funds for a project until the applicant agrees to the conditions in the document.

1.10 How does the Program Representative monitor performance after making an award?

A. Program Representatives should monitor the recipient's performance using such methods as:

(1) Onsite visits,

(2) Reviewing performance reports,

(3) Periodic communications, and

(4) Meetings.

B. If a performance issue occurs, the Program Representative should contact the servicing Grants Officer immediately to discuss how to resolve the issue. If they cannot resolve the issue, the Grants Officer should take steps according to the termination and enforcement provisions of 43 CFR 12.960. Depending on the nature and cause of the failure to achieve the performance objectives, we may ask the award recipient to pay us back.

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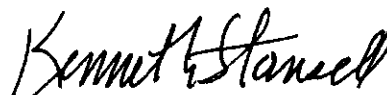
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1.11 How does an award recipient get funds?

A. Recipients of fixed amount awards complete an SF-270, Request for Advance or Reimbursement. The Program Representative approves or declines to approve the request. If he/she approves the request, we make payment.

B. Recipients of micro-grants do not need to submit an SF-270. Instead, when the Program Representative determines that the project is complete and the recipient has met the stated objectives, we make payment.

Acting
Deputy



DIRECTOR

Date: December 1, 2006